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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS
Sub-Committee of Experts on the Transport of Dangerous Goods
(Thirteenth session, Geneva, 7-17 July 1997, agenda item 3 (c))

PACKAGINGS AND INTERMEDIATE BULK CONTAINERS

MARKING OF METAL DRUMS

Transmitted by the International Confederation of Drum Reconditioners (ICDR)

Background. At the seventeenth session of the Committee of Experts, revisions to the marking requirements for new steel drums were adopted. The proposals for these changes had been developed by the ICDR in conjunction with new drum manufacturers, reconditioners, remanufacturers, and users of this packaging.

Problem. It is clear from the original proposals to change 9.5.2 through adoption of 9.5.2.1 and 9.5.2.2, as well as from discussions of these proposals at several Sub-Committee and Committee sessions, that every metal drum having a capacity greater than 100 litres is to be marked permanently (e.g., embossed) with "first line" information describing the original performance capability of the drum with the nominal thickness of the metal used in construction of that drum. The rationale for this provision is that virtually all metal drums of this size will be reprocessed through reuse, remanufacturing or reconditioning, and the permanent original performance information is essential to facilitate and to assure transport safety following such reprocessing. This was addressed explicitly in the fifth proposal of the ICDR paper at the Fourth Session of the Sub-Committee (ST/SG/AC.10/C.3/R.173), and in the oral introduction of that paper by ICDR's Chairman on July 9, 1991.

In practice, however, persons who are not familiar with these earlier discussions have expressed confusion, appearing to think that the new drum manufacturer still is obligated to determine whether large metal drums are "liable to be reconditioned." A primary purpose of the changes in 9.5.2.1 and 9.5.2.2 was to relieve the original manufacturer from having to make such a determination. The determination in 9.5.2 still is applicable to other packaging types and for metal drums having a capacity of less than 100 litres, but it is inapplicable to metal drums having a capacity greater than 100 litres.

Proposal. To allay further confusion, insert at the beginning of 9.5.2:

"Except as provided in 9.5.2.1 and 9.5.2.2, . . ."